

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

HSBC BANK PLC, et al.,

Defendants.

Adv. Pro. No. 09-1364 (SMB)

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL WITHOUT
PREJUDICE AS TO DEFENDANTS T+M TRUSTEESHIP & MANAGEMENT
SERVICES S.A. AND GTM MANAGEMENT SERVICES CORP. N.V.**

Pursuant to Federal Rule of Bankruptcy Procedure 7041(a)(1)(A)(ii) and Federal Rule of Civil Procedure 41(a)(1)(A)(ii), it is hereby stipulated and agreed by and between the plaintiff, Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff, and defendants (collectively, the “Stipulating Defendants”)

T+M Trusteeship & Management Services S.A. and GTM Management Services Corp.
N.V., through their respective attorneys, that the action as between these parties be
dismissed without prejudice, without costs to any party.

The Stipulating Defendants reserve all rights and defenses, including, but not
limited to, any challenges to the assertion of personal jurisdiction over the Stipulating
Defendants, and entry into this Stipulation of Dismissal shall not impair or otherwise
affect such rights and defenses.

Dated: July 27, 2015
New York, New York

<u>s/ Oren J. Warshavsky</u> Baker & Hostetler LLP 45 Rockefeller Plaza New York, New York 10111 Telephone: (212) 589-4200 Facsimile: (212) 589-4201 Oren Warshavsky Email: owarshavsky@bakerlaw.com Gonzalo Zeballos Email: gzeballos@bakerlaw.com Geoffrey A. North Email: gnorth@bakerlaw.com	<u>s/ Gregory W. Fox</u> Goodwin Procter LLP 620 Eighth Avenue New York, NY 10018 Telephone: (212) 813-8800 Facsimile: (212) 355-3333 William Weintraub Email: wweintraub@goodwinprocter.com Gregory W. Fox Email: gfox@goodwinprocter.com
<i>Attorneys for Plaintiff Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate Bernard L. Madoff</i>	<i>Attorneys for T+M Trusteeship & Management Services S.A. and GTM Management Services Corp. N.V.</i>

SO ORDERED

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

Dated: July 27th, 2015
New York, New York